

MILMAN LABUDA LAW GROUP PLLC

**3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042**

**TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082**

November 16, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East
Courtroom 13A South
Brooklyn, NY 11201-1804

Re: Sanchez v. EZ Parking Corp., et al.
Case No.: 1:23-cv-4052 (AMD) (VMS)

Dear Judge Scanlon,

This office represents the Defendant EK Premier Services LLC (“EK”) in the above-referenced case. See ECF Docket Entry [12](#). Defendant EK writes, with Defendant/Cross-Claimant’s consent, to respectfully request a thirty (30) day extension of time from November 15, 2023 to respond to the Defendant/Cross-Claimant’s answer with cross claims in this case.

Pursuant to ¶ II(b) of this Court’s Individual Practice Rules, Defendant EK respectfully submits that:

- (i) the original date to respond to the answer with cross claims is November 23, 2023;
- (ii) there have been no previous requests for an extension to respond to the answer with cross claims;
- (iii) the Defendant/Cross-Claimant consents to the requested extension of time; (iv) the reason for the requested extension of time is because your undersigned needs additional time to further investigate the Defendant/Cross-Claimant’s allegations and explore pre-litigation resolutions;
- (v) the requested extension would move the deadline to respond to the answer with cross-claims to Friday, December 22, 2023; and
- (vi) Defendant EK is not aware of any other scheduled dates the requested extension would affect.

Accordingly, Defendant EK respectfully submits that there is good cause for the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). Defendant EK thanks this Court for its time, attention, and anticipated courtesies in this case.

Dated: Lake Success, New York
November 16, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

*Attorneys for Defendant
EK Premier Services LLC*

VIA ECF

The Russell Friedman Law Group, LLP
Attn: Messrs. Charles Horn & Spencer D. Shapiro, Esqs.
400 Garden City Plaza, Suite 500
Garden City, NY 11530-3306
chorn@rfriedmanlaw.com
sshaprio@rfriedmanlaw.com

*Attorneys for Defendant
Yan Moshe*

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Ann M. Donnelly, U.S.D.J.
225 Cadman Plaza East
Courtroom 4G North
Brooklyn, NY 11201-1804

VIA ECF

Law Offices of Vincent E. Bauer
Attn: Vincent E. Bauer, Esq.
425 Madison Avenue, 17th Floor
New York, NY 10017-1109
vbauer@vbauerlaw.com

*Attorneys for Plaintiff
Edgar Sanchez*